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LETTER AND ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE  
DRAFT FINAL RECORD OF DECISION FOR SITE 5 TRANSFORMER STORAGE  
BONEYARD, SITE 9 CAMP MOFFETT RAVINE FILL AREA AND SITE 21 BUILDINGS  
1517/1506 AREA NSTC GREAT LAKES IL  
07/16/2014  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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PAT QUINN, GOVERNOR

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July 16, 2014

NAVFAC Midwest IPT EV  
Attn: Ms. Terese Van Donsel  
Building 1A  
201 Decatur Avenue  
Great Lakes, Illinois 60088-2801

Re: Draft Final Record of Decision for  
Site 5 – Transformer Storage Boneyard  
Site 9 – Camp Moffett Ravine Fill Area  
And Site 21 – Buildings 1517/1506 Area  
Naval Station Great Lakes, Illinois

0971255048 – Lake County  
Great Lakes Naval Station  
Superfund/Technical

Dear Ms. Van Donsel:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's *Draft Final Record of Decision for Site 5 – Transformer Storage Boneyard, Site 9 – Camp Moffett Ravine Fill Area, and Site 21 – Buildings 1517/1506 Area, Naval Station Great Lakes, Great Lakes, Illinois*. It was dated May 2014 and was received at the Agency on May 30, 2014. The Record of Decision (ROD) presents the selected remedies for Sites 5, 9, and 21, which were chosen by the Department of the Navy (Navy), as lead Agency, in accordance with the statutory and regulatory requirements under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). All three sites are addressed in one document because of their proximity to each other and their similar geology, hydrogeology, and contaminated media.

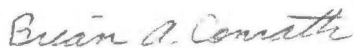
Illinois EPA has completed our review of the Record of Decision and is providing the following comments.

- 1) **Section 1.4** – The first line incorrectly references Site 19, rather than Site 9.
- 2) **Section 2.1.5** – On page 9, in the third paragraph, line 4, the word “bounded” should be “bound.”
- 3) **Sections 2.2, 2.3, and 2.4** – These sections need to provide estimates of the volume of each media to be addressed, as well as the total depth of soil contamination.

- 4) **Sections 2.2.7, 2.3.7, and 2.4.7** – There should be a subsection included herein to discuss the cost of the selected remedy. That discussion should include the standard cost estimate disclaimer language, which explains the potential fluctuation in actual cost upon implementation.
- 5) **Section 2.3.1** – It states here that the area of the former ravines was approximately 1.5 acres. The total acreage of Site 9 should be provided here as well. Part of the remedy is the groundwater use restriction that encompasses the entire site, not just the former ravines.
- 6) **Table 2-15 and Section 2.4.7.2** – In both locations it is stated that, for the selected remedy, approximately 2000 square feet in the northwest corner of the site will need to be further evaluated to determine if any action is needed. This was not discussed in the Proposed Plan. Please confirm this action is necessary and, if so, provide additional information on how and when that evaluation will take place.
- 7) **Administrative Record Reference Table** – The word “Table” in the title of the Detailed Administrative Record Reference Table is misspelled.
- 8) **Appendix B** – The State action-specific ARARs listed in Table B-3 do not correspond with those listed in the Feasibility Study (FS). The key ARARs associated with each alternative should be presented here. Please justify this change or revise the table to match the FS.
- 9) **Appendix C** – The cost estimates provided here are for the selected remedy for each site only. Suggest providing cost estimates for all of the evaluated alternatives for comparison or at least providing a statement that the other cost estimates can be found in the FS.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or via electronic mail at [brian.conrath@illinois.gov](mailto:brian.conrath@illinois.gov).

Sincerely,



Brian A. Conrath  
Remedial Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

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cc: Bob Davis, Tetra Tech NUS, Inc.  
Owen Thompson, USEPA (SR-6J)